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Attorneys for Defendants EQUIFAX  
INFORMATION SERVICES LLC

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION**

NOEMIA CARVALHO, on behalf of herself )  
and other similarly situated people, )

Plaintiff, )

v. )

CREDIT CONSULTING SERVICES, INC., )  
dba CCS, EQUIFAX CREDIT )  
INFORMATION SERVICES, LLC, )  
EXPERIAN INFORMATION SOLUTIONS, )  
INC., TRANS UNION LLC and DOES 1-50, )  
inclusive, )

Defendants. )

Case No. 5:08-CV-01317-JF-HRL

**REQUEST OF DEFENDANT EQUIFAX  
INFORMATION SERVICES LLC TO  
APPEAR TELEPHONICALLY AT THE  
CASE MANAGEMENT CONFERENCE;  
DECLARATION OF LEWIS P. PERLING  
IN SUPPORT THEREOF**

**Hearing: June 27, 2008  
Time: 10:30 a.m.  
Courtroom 3**

**[[Proposed] Order Lodged Concurrently]**

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COMES NOW Defendant Equifax Information Services LLC (“Equifax”), incorrectly sued herein as “Equifax Credit Information Services LLC,” and respectfully requests to appear telephonically at the Case Management Conference currently set for on June 27, 2008, at 10:30 a.m. before the Honorable Howard R. Lloyd.

Good cause exists to grant this request because counsel for Equifax would be required to travel from Atlanta, Georgia and/or Laguna Beach, California to San Jose, California, such that Equifax will incur significant travel costs and attorney’s fees at a time when Equifax is attempting to minimize the cost of litigation in this and numerous other matters. Counsel for Equifax believes the objectives of this conference will be accomplished if Equifax appears by telephone. Equifax will be appearing in person at the hearing on Plaintiff’s Motion to Remand on June 20, 2008 and wishes to avoid the costs of travel on this twice within a week.

KING & SPALDING LLP

Dated: June 18, 2008

/s/ Lewis P. Perling  
LEWIS P. PERLING  
(admitted pro hac vice)

Attorneys for Defendant EQUIFAX  
INFORMATION SERVICES LLC

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**DECLARATION OF LEWIS P. PERLING**

I, Lewis P. Perling, hereby declare:

1. I am admitted to practice *pro hac vice* in this case before this Court and am associated with King & Spalding LLP, counsel for Defendant Equifax Information Services LLC ("Equifax") in the above-captioned matter. I have personal knowledge of the facts stated herein and if called as a witness, I could and would competently testify thereto.

2. My office is located in Atlanta, Georgia. An in-person appearance at the Case Management Conference scheduled for June 27, 2008, would require me, and/or my co-counsel Barry Goheen also of King & Spalding in Atlanta or Thomas P. Quinn of Nokes & Quinn of Laguna Beach, California, to travel by plane to San Jose, California and potentially seek accommodations the evening before. This will cause Equifax to incur significant attorneys' fees and costs for travel time and expenses at a time when Equifax has requested that we minimize the cost of litigation in this and other matters through, among other things, requesting telephonic court appearances whenever possible. We will be attending a hearing in this Court a week earlier, on June 20, 2008, and wish to avoid incurring the cost of travel to San Jose twice on this matter within a week.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed this 18<sup>th</sup> day of June 2008.

/s/ Lewis P. Perling

Lewis P. Perling

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**CERTIFICATE OF SERVICE**

CARVALHO v DEFENDANT EQUIFAX, et al, CASE NO: 5:08-CV-01317-JF

I, the undersigned, certify and declare that I am over the age of 18 years, employed in the County of Fulton, State of Georgia, and not a party to the above-entitled cause.

On June 18, 2008, I served a true copy of the  
REQUEST OF EQUIFAX TO APPEAR TELEPHONICALLY; DECLARATION OF LEWIS P.  
PERLING IN SUPPORT THEREOF

☐ By personally delivering it to the persons(s) indicated below in the manner as provided in FRCivP5(B);

☐ By depositing it in the United States Mail in a sealed envelope with the postage thereon fully prepaid to the following;

☒ By ECF: On this date, I electronically filed the following document(s) with the Clerk of the Court using the CM/ECF system, which sent electronic notification of such filing to all other parties appearing on the docket sheet;

Ron Keith Bochner  
Law Office of Ron Bochner  
3333 Bowers Avenue, Suite 130  
Santa Clara, CA 95054

Deanna L. Johnston  
Kelli A. Crouch  
Jones Day  
555 California Street, 26<sup>th</sup> Floor  
San Francisco, CA 94104-1500

Stephen Julian Newman  
Brian C. Frontino  
Strook & Strook  
2029 Century Park East  
Los Angeles, CA 90067

I hereby certify that I am employed in the office of an attorney who is admitted pro hac vice in this Court at whose direction the service was made.

I hereby certify under the penalty of perjury that the foregoing is true and correct.

/S/ STEPHANIE PELTIER

STEPHANIE PELTIER

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REQUEST OF EQUIFAX TO APPEAR TELEPHONICALLY AT CASE MANAGEMENT  
CONFERENCE; DECLARATION OF LEWIS P. PERLING IN SUPPORT THEREOF

Case No. 5:08-cv-01317-JF-HRL

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16 Email: LPerling@kslaw.com

17 Attorneys for Defendants EQUIFAX  
18 INFORMATION SERVICES LLC  
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25 **UNITED STATES DISTRICT COURT**  
26 **NORTHERN DISTRICT OF CALIFORNIA**  
27 **SAN JOSE DIVISION**

28 NOEMIA CARVALHO, on behalf of herself )  
and other similarly situated people, )

Plaintiff, )

v. )

29 CREDIT CONSULTING SERVICES, INC., )  
30 dba CCS, EQUIFAX CREDIT )  
31 INFORMATION SERVICES, LLC, )  
32 EXPERIAN INFORMATION SOLUTIONS, )  
33 INC., TRANS UNION LLC and DOES 1-50, )  
34 inclusive, )

Defendants. )

Case No. 5:08-CV-01317-JF-HRL

**[PROPOSED] ORDER GRANTING  
REQUEST OF DEFENDANT EQUIFAX  
INFORMATION SERVICES LLC TO  
APPEAR TELEPHONICALLY AT THE  
CASE MANAGEMENT CONFERENCE**

**Hearing: June 27, 2008  
Time: 10:30 a.m.  
Courtroom 3**

35 The Request of Defendant Equifax Information Services LLC ("Equifax") to Appear  
36 Telephonically at the Case Management Conference came before Magistrate Judge Howard R.  
37 Lloyd of the above-captioned Court on or about June \_\_, 2008. After considering the Request  
38 and good cause appearing, IT IS HEREBY ORDERED that Equifax shall be permitted to appear

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1 via telephone at the Case Management Conference currently scheduled for June 27, 2008 at 10:30  
2 a.m.

3 DATED: \_\_\_\_\_, 2008

\_\_\_\_\_  
The Honorable Howard R. Lloyd  
United States Magistrate Judge

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